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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.,

Plaintiff, Counter-defendant,

v.

APPLE INC.,

Defendant, Counterclaimant.

Case No. 4:20-cv-05640-YGR

IN RE APPLE IPHONE ANTITRUST
LITIGATION

Case No. 4:11-cv-06714-YGR

DONALD R. CAMERON, *et al.*,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 4:19-cv-03074-YGR

**JOINT STATEMENT REGARDING
VALIDATION OF DOCUMENT
PRODUCTIONS**

Judge: Hon. Yvonne Gonzalez Rogers

1 **Joint Statement:** In connection with negotiations concerning a draft protocol to
2 govern discovery of electronically stored information in the above-captioned actions, Plaintiffs
3 and Defendant Apple Inc. (“Apple”) (collectively, “the Parties”) filed with the Court a joint
4 statement on October 26, 2020, stating in part that the Parties continued to meet and confer
5 regarding validation procedures to test the sufficiency and accuracy of the Parties’ productions.
6 The Parties stated that they had agreed to either (i) reach agreement on validation procedures by
7 November 9, 2020, or (ii) if the Parties cannot reach agreement, submit any outstanding issues in a
8 joint statement to Magistrate Judge Hixson by November 9, 2020.

9 On November 9 and 13, 2020, the Parties filed with the Court joint statements,
10 stating that the Parties had agreed to continue negotiations and postponing the deadline by which
11 they would either (i) reach agreement on validation procedures, or (ii) if the Parties cannot reach
12 agreement, submit any outstanding issues in a joint statement to Magistrate Judge Hixson. The
13 current deadline, reflected in the Parties’ joint statement of November 13, 2020, is November 20,
14 2020.

15 The Parties continue to negotiate and make additional progress but have not yet
16 reached agreement on validation procedures. The Parties have agreed to extend the deadline for
17 submission of an agreement or dispute on this issue to December 2, 2020 at 5:00 p.m. Pacific
18 Time.

1 Dated: November 20, 2020

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5 Respectfully submitted,

6 By: /s/ Yonatan Even
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9 Dated: November 20, 2020

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11
12 **E-FILING ATTESTATION**

13 I, Jay P. Srinivasan, am the ECF User whose ID and password are being used to file
14 this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the
15 signatories identified above has concurred in this filing.

16
17 /s/ Jay P. Srinivasan

18 Jay P. Srinivasan